

V. Overarching State Strategies

- A. Identify how the State will use WIA Title I funds to leverage other Federal, State, local, and private resources in order to maximize the effectiveness of such resources and to expand the participation of business, employees, and individuals in the statewide workforce investment system.

A statewide MOU that will involve a number of entities at the federal, state, and local levels will be developed that will outline the roles and responsibilities of each organization. This MOU will also serve to align the strategic plans and leverage resources toward meeting common goals within the workforce system in support of economic development. Some of these partnerships have been longstanding while others are relatively new. It is anticipated that WIA funds will be used to fill the gaps to meet needs not met from other resources.

The State will provide monitoring and assistance to local WIBs to ensure that WIA Title I funds are not duplicated by other services. One purpose of the regional planning/ staffing grants being provided by the state is for local partnership development that will find ways to add value to partners and increase participation in system operations.

The state has engaged a consultant to evaluate the current system and to make recommendations that will assist the State in developing policy and technical assistance for WIBs regarding system operator. The system operator will be a key element in leveraging funds and resources at the local level. The system operator will report to the WIB and work with the partners in each workforce investment area to help carry out the strategic plan and other duties.

The State will work with the WIBs to investigate fee-for-service opportunities and other plans for certain services provided to employers. It is also anticipated that the State will ask local WIBs to discuss in their planning documents the process for setting up fee-for-service strategies that are non-duplicative of other partner services, and a timetable for implementation.

The State will ask the U.S. Department of Labor for a waiver of the 50% customized training cost sharing for employer's requirement. Approximately 95% of workers in Oklahoma are employed by small business and the 50% requirement is often too burdensome. Smaller employers often cannot afford even a 50% match, yet these workers often need customized training the most.

A resource development position has been added at the state level to leverage existing resources, as well as finding new sources. This staff person will work with the Governor's Council and the WSST, as well as local WIBs to explore areas of funding for innovative projects and concepts.

The process by which local areas in the State may submit and obtain approval by the State of applications for waivers of requirements applicable under Title I of WIA, including provisions for public review and comment on local area waiver applications.

Local areas will submit requests for waivers to OESC. OESC will make its recommendation to the Office of Workforce Solutions in the Oklahoma Department of Commerce. The Office will begin consultations with officials from the Employment & Training Division of the Oklahoma Employment Security Commission once the waiver is received. The local area submitting the request for waiver must also publish the request on its website and/or in the legal notices of one local newspaper with a primary circulation in the local workforce area. If the request is posted to the local area's website, it must remain on the website for at least two weeks and interested parties must be informed on how to comment on the proposed waiver, either by e-mail or regular mail. If the waiver is published in a local newspaper, it must run in two consecutive editions. Expense to publish the waiver request will be borne by the requesting local area.

The waiver request will be posted on the OESC website within one week of receipt. Once the waiver request is posted, a two-week period will be allowed for public comment. Interested parties will be able to comment on the waiver request by direct link on the website, e-mail, or regular mail. A deadline will be posted for public comment. At the conclusion of the two-week comment period, all comments from the local area will be forwarded to the Office of Workforce Solutions and reviewed by Office of Workforce Solutions and OESC staff. A recommendation for approval or denial will be forwarded to the Governor. Once the Governor has made a decision on the waiver, a letter will be forwarded to WIB staff and the WIB chairperson regarding that decision and next steps.

It is the goal of OESC to have waiver requests granted or denied within 45 days of receipt.

The statutory and regulatory requirements of Title I that are likely to be waived by the State under the plan.

Statutory Provisions to be Waived:

1. WIA §101(8) (29 USCA §2801(8)) defines customized training and required employers to pay not less than 50% of the cost of the training.

Customized Training Waiver

Customized training optimizes the resources available under workforce development initiatives to meet the needs of employers and job seekers. Customized training focuses on employers' and job seekers' needs while minimizing programmatic and bureaucratic barriers.

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\$50,000 in funds for training for incumbent workers. The grant recipient must match the funds, either cash or in-kind. While this program is for incumbent workers, many potential grantees propose customized training programs for their incumbent workers. The State set aside \$1 million in 2004 for incumbent worker funds, however, more than \$5 million in proposals were received. Many small businesses are excluded from these funds because they cannot meet the match requirement. This waiver will allow local WIBs to provide funds for customized training on a sliding scale that will open the door for more small business participation in the Oklahoma workforce development system.

The proposed sliding scale for the employer match will create the necessary flexibility for employers to provide the required match at a rate that more appropriately represents a particular business' or industry's cost benefit ratio of contributing to a match amount to receive skilled employees. Allowing businesses and industries to apply the sliding scale to determine the match amount will increase employer participation in WIA customized training programs at the local level. The sliding scale will answer employers' primary reason for not participating in the customized training. WIBs will increase participation rates for skilled job seekers that received training and found employment. Employers will benefit by having a labor pool with the marketable skills they require.

Proposed Employer Match Sliding Scale

The proposed employer match sliding scale will range from 10 to 50 percent, based on quality characteristics of the customized training. Quality characteristics will be based on goals of the State Plan that adhere to the principles of training workers in targeted industry sectors. The State, with input from local workforce investment areas, will develop the sliding scale and the process by which it will be applied. The State is committed to ensuring that participants in customized training programs will acquire the skills to meet workplace requirements for long term employment and work toward sustaining employment in targeted industry sectors.

Goals to be Achieved by this Waiver

- Increase flexibility at the local level to serve business and industry through a demand-driven approach to their specific needs
- Equip workers with relevant job training with relevant skills that lead to targeted industry sectors
- Improve the ability of WIBs to work with the private sector and respond quickly to changes in their areas
- Increase local flexibility for design and control of training programs

Programmatic Outcomes

- Increase the percentage of employers using customized training as a means to hire and retain skilled workers
- Increase the percentage of workers trained and hired through customized training programs

Individuals Impacted by this Waiver

Employers will benefit from the waiver due to the reduced match requirement. This will make customized training a more attractive option for acquiring workers trained to their specifications.

The waiver will impact the provision of training services through customized training to Adults, Older Youth, and Dislocated Workers eligible for services under WIA. In particular, WIA eligible individuals with multiple barriers to employment, low basic skills, and English language proficiency stand to benefit the most from customized training.

Process to Monitor Progress in Implementing the Waiver

The State will monitor each customized training program separately from normal WIA program monitoring. Technical assistance during the implementation phase of the waiver will cover areas such as procurement, contracting, and program design. The State will continuously monitor performance reports and compares actual performance with contract benchmarks. The State will continue to make adjustments to monitoring performance requirements to ensure that performance goals and objectives are met for all WIA customized training programs. The State will monitor progress on this, and all waivers under Work-Flex, by reviewing monthly expenditure and performance reports submitted by WIBs. Provisions in contracts for customized training programs will address specific performance measures for each project.

Requested waiver for use of the eligible training provider system for older and out-of-school youth (this is in addition to the Work-Flex request)

The Oklahoma Employment Security Commission, the State operational entity for the Workforce Investment Act, is requesting a waiver of the requirement to competitively procure training providers for Older and Out-of-School Youth. Instead, local Workforce Development Boards would have the option to use the Eligible Training Provider system to secure training providers for these two youth populations.

This waiver request follows the format identified in WIA §189(i)(4)(B) (29 USCA §2939(i)(4)(B) and WIA Regulations at 20 CFR §661.420(c).

Statutory Provisions to be Waived:

- WIA §123 (29 USCA §2843) provides that local areas will award grants or contracts for youth services based on a competitive process; and
- WIA §134 (d)(4) (29 USCA §2864(d)(4) limits access to the eligible training providers to Adult and Dislocated Workers.

The Eligible Training Provider System requires that training providers meet rigid requirements for certification to provide training for Adult and Dislocated Workers. The State believes that the Older Youth and Out-of-School Youth would benefit from the services provided by these certified training providers. Allowing WIBs to use the Eligible Training Provider System for Older and Out-of-School Youth will result in streamlined services and increased local flexibility.

The State is committed to ensuring that the appropriate youth services are provided in the ten required program elements. Programmatic and system monitoring, along with training provided by the State, will be the avenues to ensure compliance in this area.

State or Local Statutory or Regulatory Barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. State regulations and policy statements are in compliance with current federal law. Upon notification of the approval of this waiver request, state policy will be written to comply with the terms of this waiver.

Goals to be Achieved by the Waiver

- Improve youth services through increased customer choice in accessing training opportunities in demand occupations
- Increase the number of training providers for Older and Out-of-School Youth
- Provide WIBs more flexibility in securing service providers
- Promote better utilization of service providers in rural areas
- Eliminate duplicate processes for service providers

Programmatic Outcomes

The numbers of training providers in workforce areas will increase. Training services for youth will be available in a faster and more efficient manner. Many WIBs find it difficult to secure training providers willing to competitively bid to provide training to Older and Out-of-School Youth. When WIBs are required to competitively procure training services, the time period for matching training providers to youth who are in need is lengthened considerably. By allowing WIBs to purchase training services for Older and Out-of-School Youth from the Eligible Training Provider system, youth will be able to access training services more quickly. Additionally, youth will be able to choose the training provider they prefer.

Individuals Impacted by the Waiver

- Older and Out-of-School Youth will benefit because they will be able to select from a list of certified training providers and will receive services more quickly
- WIBs will benefit because they will not have to direct their resources to costly and time consuming competitive procurements

- Training providers will benefit because they will not have to follow two separate procedures to provide training for Adult and Dislocated Workers, which requires certification, and for Older and Out-of-School Youth, which requires competitive bidding.

Process used to Monitor Progress and Implementing the Waiver

The State will issue an OETI to WIBs and service providers. The OETI will provide direction to the WIBs on the use of the Eligible Training Provider System for Older and Out-of-School Youth; identify the criteria for determining when the use of Individual Training Accounts is appropriate; provide guidance to WIBs on how to assist youth in choosing appropriate training provider; and provide direction to WIBs in modifying their local plan. Progress on the waiver will be monitored through regular dialogue with WIBs and training providers and through contact with WIB staff. The State will also examine adherence to this policy with its regularly scheduled programmatic and system monitoring.

VI. Describe major State policies and requirements that have been established to direct and support the development of a statewide workforce investment system not described elsewhere in this Plan as outlined below.

A. What State policies and systems are in place to support common data collection and reporting processes, information management, integrated service delivery, and performance management?

Oklahoma has the Service Link web-based system that workforce professionals utilize statewide for WIA programmatic reporting purposes. WIA case managers enter customer data into the system and can update information as necessary. Service Link compiles reporting data for each local area, as well as statewide numbers. Training and support for Service Link is provided by the State and occurs as needed.

The Oklahoma JobLink system allows job seekers to search for work, post resumes online, research career information, sign up for automatic job notification by email, and much more. In addition to serving job seekers JobLink helps employers post jobs, search for qualified employees, research career information, sign up for automatic email notification of new job seekers whose resumes match job-orders, and receive assistance in creating job openings.

Oklahoma is also a member of America's Job Link Alliance. Members of the Alliance are committed to sharing information, practices about designing, implementing, managing and improving their workforce development initiatives and information technology systems. AJLA supports efforts such as marketing, training and purchasing that makes these initiatives and systems successful. Alliance Members share or jointly develop a core set of modules and features and adapt and improve them to meet their individual needs; in turn sharing those improvements with other members for their consideration. However, the Alliance also continues that cooperative relationship to